

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

IN RE: JULIAN O. and LATRELL B. GARNETT
Debtor.

JULIAN O. and LATRELL B. GARNETT,
Plaintiffs,

v.

REAL TIME RESOLUTIONS, INC. as agent for PYOD, LLC,
Defendant.

Chapter 13

Case No. 17-17167MDC

Adv. No. _____

COMPLAINT TO DETERMINE SECURED STATUS

1. Debtors own their residence 213 W. Abbotsford Avenue, Philadelphia, PA with a value of \$78,295.00. **Exhibit A.**
2. Debtors have a mortgage with Wells Fargo with a balance of approximately \$140,000.
3. The 2nd mortgage to Real Time Resolutions, Inc. as agent for PYOD, LLC is wholly unsecured pursuant to 11 U.S.C. 506 and In Re: McDonald.

WHEREFORE, Debtors pray that this Honorable Court enter an order finding the 2nd mortgage wholly unsecured.

Dated: October 23, 2017

CIBIK & CATALDO, P.C.
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